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## LATHAM & WATKINS LLP

April 12, 2017

### VIA ECF

Hon. Ronald L. Ellis, U.S.M.J.  
 United States District Court  
 Southern District of New York  
 500 Pearl St.  
 New York, NY 10007

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Re: Request for extension of time for Plaintiff to move to dismiss Defendants' Amended Answers and Counterclaims and entry of case management schedule in *Hudson Bay Master Fund Ltd. v. Patriot National, et al.*, No. 16-cv-02767 (GBD) (RLE)

Dear Judge Ellis:

I write on behalf of all parties in the above-captioned matter to request entry of a revised case management schedule, in the form of the Proposed Revised Scheduling Order attached to this letter as Exhibit A.<sup>1</sup> The parties have met and conferred and agreed to the attached Proposed Revised Scheduling Order.

Notably, the Proposed Revised Scheduling Order includes an extension of time for Plaintiff to move to dismiss Defendants' Amended Answers and Counterclaims from this coming Friday, April 14, 2017, to Friday, April 21, 2017, and corresponding extensions of time for oppositions and reply. This is Plaintiff's first request for an extension with respect to the motion to dismiss. The Proposed Revised Scheduling Order also extends the discovery schedule by 30 days and correspondingly extends the subsequent deadlines relating to dispositive motions and trial.

Respectfully submitted,



Serrin Turner  
 of LATHAM & WATKINS LLP

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<sup>1</sup> The same Proposed Revised Scheduling Order is being submitted under separate cover in related case *CVI Investments, Inc. v. Patriot National, Inc.*, No. 16-cv-2787 (GBD) by counsel for CVI Investments, Inc.

**LATHAM & WATKINS LLP**

cc: All counsel of record (via ECF)